UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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TEMISHA LESHON JONES
SSN: XXX-XX-5869

                             Plaintiff,   **COMPLAINT**

      v.   Civil Action No. _____

COMMISSIONER OF SOCIAL SECURITY,

                             Defendant,

_____

Plaintiff, Temisha Leshon Jones, Social Security Number xxx-xx-5869, respectfully states:

1. The jurisdiction of this Court is invoked pursuant to 42 U.S.C. § 405(g) and 42 U.S.C. § 1383(c)(3) to review a decision of the Commissioner of Social Security denying Plaintiff's application for Social Security Disability benefits and Supplemental Security Income benefits for a lack of disability.

2. This action is an appeal from a final administrative decision denying Plaintiff's claim. (Exhibit "A")

3. This action is commenced within the appropriate time period set forth in the attached Appeals Council Notice dated 9/2/2021. (Exhibit "B")

4. Plaintiff resides at Troy, New York.

5. The Defendant is the Commissioner of Social Security of the United States of America.

6. Plaintiff is disabled.

7. The conclusions and findings of fact of the Defendant are not supported by substantial evidence and are contrary to law and regulation.

WHEREFORE, Plaintiff prays that this Court:

1. Finds that the Plaintiff is entitled to disability insurance benefits and supplemental security income benefits under the provisions of the Social Security Act; or

2. Reverse and remand this matter solely for the purpose of calculating benefits, or in the alternative, reverse and remand this matter for further administrative proceedings pursuant to 28 U.S.C.§405(g).

3. Award attorney's fees under the Equal Access to Justice Act, 26 U.S.C. § 2412, on the grounds that the Commissioner's action in this case was not substantially justified; and

4. Order such other and further relief as the Court deems just and proper.

Dated: 10/28/2021

/s/ Kenneth Hiller

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